UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA PHILADELPHIA DIVISION

In re:

Donna Laghjichi

Debtor

U.S. Bank National Association, as Trustee, as successor to U.S. Bank Trust National Association, as Trustee, which was successor to First Trust National Association, as Trustee, for Home Improvement and Home Equity Loan Trust 1997-C

Movant

v.

Donna Laghjichi

Debtor/Respondent

WILLIAM C. MILLER, Esq., Esquire

Trustee/Respondent

Bankruptcy No. 19-11399-mdc

Chapter 13

Hearing Date: March 10, 2020 Hearing Time: 10:30 AM

Location: Courtroom Number #2 Philadelphia Division/Nix Building

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

U.S. Bank National Association, as Trustee, as successor to U.S. Bank Trust National Association, as Trustee, which was successor to First Trust National Association, as Trustee, for Home Improvement and Home Equity Loan Trust 1997-C, has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1); for costs and disbursements of this action, and for such other and further relief as to the Court may deem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the motion, then on or before <u>February 27. 2020</u> you or your attorney must filed a response to the Motion. (see Instructions on next page).
 - (a) File an answer explaining your position at: Courtroom Number #2 Philadelphia Division/Nix Building

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

(b) Mail a copy to the movant's attorney:

Sheetal R. Shah-Jani, Esquire RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 19(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the Motion is scheduled to be held before Chief Judge Magdeline D. Coleman on February 18, 2020 at 10:30 in Courtroom 2, United States Bankruptcy Court, Philadelphia Division/Nix Building. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Date: February 13, 2020

RAS Citron, 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone No.: 470-321-7112 Fax: 404-393-1425

By: /s/ <u>Sheetal R. Shah-Jani</u> Sheetal R. Shah-Jani, Esquire

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